

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE

_____	)	
Marc Martel,	)	Docket No. 1:17-cv-00407-SM
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
Computer Sciences Corporation,	)	
	)	
Defendant.	)	
_____	)	

**PLAINTIFF'S FIRST SET OF  
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF  
DOCUMENTS TO BE ANSWERED BY COMPUTER SCIENCES CORPORATION**

Please take notice that the Plaintiff requests, pursuant to Rule 33 of the Federal Rules of Civil Procedure, that the Defendant Computer Sciences Corporation ("CSC" or "Defendant") answer, within 30 days after service hereof, the following written Interrogatories. In answering, CSC is requested to identify separately and in a matter suitable for a Rule 34 Request for Production of Documents for Inspection and Copying of the Federal Rules of Civil Procedure, and for use in a subpoena, all sources of information, whether human, documentary, computer tapes, card decks, memory cores, e-mails or other recordations and all records maintained by CSC or any other person or organization at any location, office or facility, on which it relies in answering these Interrogatories of which pertain or relate to the information called for by these Interrogatories. In lieu of identifying particular documents, when such identification is requested, said documents may, at the option of CSC, be attached to the responses to these Interrogatories.

8. Please produce any and all documents related to any plan for reorganization and/or reduction in force in 2013 or 2014, including, but not limited to, any documents evidencing the Defendant's assertion that the decision to eliminate Plaintiff's position was made in February of 2014.

9. Please produce all documents related to investigation of Plaintiff's 2014 internal ethics complaint.

10. Please produce all documents related to the new operating model, \$1 billion cost reduction target and "delaying" of organizational management structure as alleged in CSC's February 11, 2015 Response to the New Hampshire Commission for Human Rights.

11. Please produce William Boyce's complete personnel file, as that term is used and/or defined in N.H. RSA 275:56 and the Regulations of the New Hampshire Department of Labor.

12. Please produce copies of any and all documents which in any way relate to any of Defendant's Answers to Plaintiff's First Set of Interrogatories herein, not already produced above.

13. Please produce any documents related to Defendant's Answer to Complaint.

14. Please produce any and all documents relating to Defendant's defenses (including, but not limited to, each affirmative defense) to this action.

15. Please produce any and all witness statements relating to Defendant's defenses to his action.

16. Please produce any insurance agreement(s) under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

17. Please produce any and all documents related to EEOC's (or any other governmental agency's) investigation of Defendant in any employment matter over the past ten years.

Respectfully submitted,

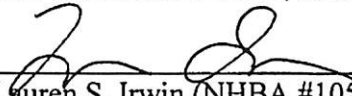
MARC MARTEL, Plaintiff

By His Attorneys

UPTON & HATFIELD, LLP

Date: June 8, 2018


By:

  
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**CERTIFICATE OF SERVICE**

I hereby certify that an original and two copies of the foregoing was emailed and mailed, via first class mail, this date, to counsel for Defendant.

Date: June 8, 2018

  
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Lauren S. Irwin